

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SHOSHANA HEBISHI,)	
)	
Plaintiff,)	Hon. Terrence G. Berg
)	
v.)	Magistrate Judge Laurie J. Michelson
)	
UNITED STATES OF AMERICA, et al,)	Case No. 4:13-cv-10253
)	
Defendants.)	

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AGREEMENT
AND STIPULATED PROTECTIVE ORDER**

NOW COME Plaintiff, SHOSHANA HEBISHI, and Defendant, FRONTIER AIRLINES, INC. (collectively hereinafter the "Parties"), by and through their respective counsel, and hereby move this Court for entry of a Confidentiality Agreement and Stipulated Protective Order. In support of their Motion, the Parties incorporate by reference their Memorandum in Support of their Joint Motion and Exhibit A filed contemporaneously herewith.

Dated: May 15, 2013

Respectfully submitted,

/s/ Brian T. Maye

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Counsel for Plaintiff

**JOINT MEMORANDUM IN SUPPORT OF JOINT MOTION FOR ENTRY OF
CONFIDENTIALITY AGREEMENT AND STIPULATED PROTECTIVE ORDER**

NOW COME Plaintiff, SHOSHANA HEBISHI, and Defendant, FRONTIER AIRLINES, INC. (collectively hereinafter the “Parties”), by and through their respective counsel, and for their Memorandum in Support of their Joint Motion for Entry of a Confidentiality Agreement and Stipulated Protective Order (hereinafter “Stipulated Protective Order”), state as follows:

The Parties’ Joint Motion for Entry of a Stipulated Protective Order is made pursuant to Rules 7(b) and 26(c)(1) of the Federal Rules of Civil Procedure, as well as Local Rule 7.1. The Parties respectfully request that the Court enter the attached Stipulated Protective Order to ensure that confidential information produced during the course of this litigation is not improperly disclosed. The Stipulated Protective Order permits a producing party to designate materials as confidential if such party reasonably believes the material contains trade secrets, proprietary information, personally identifying financial or medical information, or other confidential material. The Stipulated Protective Order also establishes rules for use of such confidential materials, including notice to the producing party prior to any public disclosure. The Stipulated Protective Order does not create any presumption with regard to the actual confidentiality of any material or alter the normal burden of proof necessary for obtaining a protective order from the Court.

Counsel for the Parties negotiated the Stipulated Protective Order to protect the interests of the Parties during the course of this litigation. With the entry of the Stipulated Protective Order, the Parties will have confidence that materials they designate as confidential will not be publicly disclosed without, at a minimum, advance notice and an opportunity to contest such disclosure.

WHEREFORE, the Parties jointly move the Court for entry of the Stipulated Protective Order.

Dated: May 15, 2013

Respectfully submitted,

/s/ Brian T. Maye

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 15, 2013, I electronically filed the foregoing Joint Motion for Entry of Confidentiality Agreement and Stipulated Protective Order, Memorandum in Support and an attachment with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Brian T. Maye

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